



FRED WILLIAMSON & ASSOCIATES, INC.  
*Telecommunications Management Services*

VIA ECFS

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of Secretary  
445 12<sup>th</sup> Street, S. W.  
Washington, D.C. 20554

July 1<sup>st</sup>. 2017

RE: Submission of information Pursuant to FCC 54.313 Rules and Request  
for Confidential Treatment – ETC Annual Reports and Certifications WC  
Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, **TWIN VALLEY TELEPHONE, INC. or "Twin Valley"** (Study Area Code **411840**), is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Twin Valley by its authorized representative, hereby requests confidential treatment of one attachments to its FCC Form 481: the RUS Annual Telecommunications Operating Report identified on Line 3005, which was redacted in the ECFS submission.

The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 Protective Order in WC Docket Nos. 10-90 and 14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources.

The request for confidential treatment is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA).

Twin Valley keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Twin Valley is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

Twin Valley requests that the information contained in its annual financial report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

Twin Valley offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

*(1) Identification of the specific information for which confidential treatment is sought:*

Attachment to Line 3005 of FCC Form 481 – RUS Operating Report. Specifically, confidential treatment is sought for all information in the report.

*(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:*

The information was submitted in WC Docket Nos. 10-90 and 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form.

*(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:*

The RUS Operating Report for Telecommunication Borrowers contains financial information and subscriber counts for a privately held company, which is not made publicly available.

*(4) Explanation of the degree to which the information concerns a service that is subject to competition:*

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

*(5) Explanation of how disclosure of the information could result in substantial competitive harm:*

Disclosure of the information contained in the operating report would provide competitors with detailed information regarding the Company's financial position. This would provide competitors access to confidential information they could employ to develop their own plans in a particular service area. This could cause competitive harm to the Company.

*(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:*

The Company has continually treated financial information as confidential and carefully controls the information to protect it from competitors.

*(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:*

The redacted information in the RUS Operating Report are not available to the public, and third party access is limited as described in (6) above.

*(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:*

The Company requests that the extracted information be withheld from public inspection indefinitely. The information and financial details would provide valuable information to competitors for several years beyond that period.

*(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:*

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,

*Tim Morrissey*

President,  
FWA, Inc.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

REDACTED FOR PUBLIC INSPECTION

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	TRACI THOMPSON
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7854272211 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	traci.thompson@tvttinc.net
	Form Type	54.313 and 54.422

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<210> For the prior calendar year, were there any reportable voice service outages? No

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**(300) Unfulfilled Service Request  
Data Collection Form**FCC Form 481  
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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtinc.net

&lt;300&gt; Unfulfilled service request (voice)

0

&lt;310&gt; Detail on attempts (voice)

Name of Attached Document

&lt;320&gt; Unfulfilled service request (broadband)

0

&lt;330&gt; Detail on attempts (broadband)

Name of Attached Document



<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtinc.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
411840KS510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvttinc.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	411840KS610.pdf

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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtinc.net

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

[illegible]

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-- See attached worksheet --

**(800) Operating Companies  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtnet.net
<810>	Reporting Carrier	TWIN VALLEY TELEPHONE COMPANY, INC.
<811>	Holding Company	Twin Valley Management, Inc.
<812>	Operating Company	TWIN VALLEY TELEPHONE COMPANY, INC.

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

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&lt;900&gt; Does the filing entity offer tribal land services? (Y/N) No

&lt;910&gt; Tribal Land(s) on which ETC Serves

&lt;920&gt; Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtnet.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 411840KS1010.pdf

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Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 411840KS1030.pdf

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Name of Attached Document



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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&lt;1100&gt; Certify whether terrestrial backhaul options exist (Y/N)

Yes

&lt;1130&gt; Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvttinc.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.twinvalley.net/customer-support/>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing  
Required Information

Name of Attached Document Listing  
Required Information

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

&lt;2016&gt; Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

&lt;2017A&gt; Connect America Fund Phase II recipient?

&lt;2017C&gt; Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

&lt;2018&gt; Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

&lt;2019&gt; Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	411840KS1030b.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	411840KS3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or	<input type="checkbox"/>	
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	<input type="checkbox"/>	
(3023)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3024)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3025)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3026)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

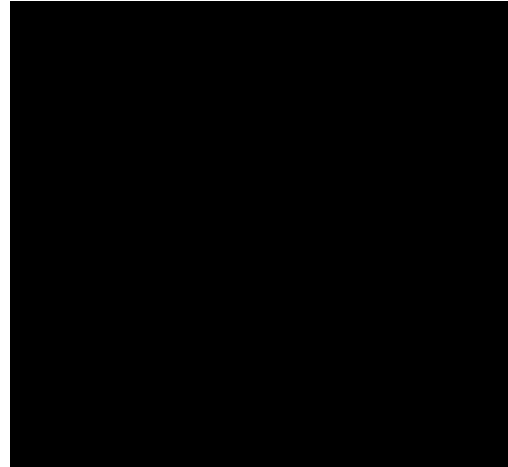
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

**REDACTED FOR PUBLIC INSPECTION**

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<030> Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
<035> Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtnet.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>FWA, INC.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	FWA, INC.
Name of Reporting Carrier:	TWIN VALLEY TEL INC
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2017
Printed name of Authorized Officer:	Scott Leitzel
Title or position of Authorized Officer:	Vice President - Operations
Telephone number of Authorized Officer:	7854279504 ext.
Study Area Code of Reporting Carrier:	411840 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	TWIN VALLEY TEL INC
Name of Authorized Agent Firm:	FWA, INC.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2017
Name of Authorized Agent Employee:	TOM KARALIS
Title or position of Authorized Agent or Employee of Agent	CONSULTANT
Telephone number of Authorized Agent or Employee of Agent:	9182981618 ext.
Study Area Code of Reporting Carrier:	411840 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
<035>	Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtninc.net

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
KS	Morganville 926		FR	17.8	0.0	1.17	0.0	18.97
KS	Green 944		FR	17.8	0.0	1.17	0.0	18.97
KS	Clifton 455		FR	17.8	0.0	1.17	0.0	18.97
KS	Clyde 446		FR	17.8	0.0	1.17	0.0	18.97
KS	Leonardville 293		FR	17.8	0.0	1.17	0.0	18.97
KS	Olsburg 468		FR	17.8	0.0	1.17	0.0	18.97
KS	Riley 485		FR	17.8	0.0	1.17	0.0	18.97
KS	Milford 463		FR	18.1	0.0	1.19	0.0	19.29
KS	Wakefield 461		FR	18.1	0.0	1.19	0.0	19.29
KS	Longford 388		FR	17.8	0.0	1.17	0.0	18.97
KS	Aurora 464		FR	17.8	0.0	1.17	0.0	18.97
KS	Glasco 568		FR	17.8	0.0	1.17	0.0	18.97
KS	Delphos 523		FR	17.8	0.0	1.17	0.0	18.97
KS	Barnard 792		FR	17.0	0.0	1.11	0.0	18.11
KS	Beverly 436		FR	17.0	0.0	1.11	0.0	18.11
KS	Tescott 283		FR	17.0	0.0	1.11	0.0	18.11
KS	Bennington 488		FR	17.0	0.0	1.11	0.0	18.11
KS	Miltonvale 427		FR	17.0	0.0	1.11	0.0	18.11
KS	Greenleaf 747		FR	17.0	0.0	1.11	0.0	18.11

**(710) Broadband Price Offerings  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
<035>	Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtinc.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	KS	Morganville 926	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Morganville 926	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Morganville 926	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Green 944	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Green 944	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Green 944	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Clifton 455	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Clifton 455	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Clifton 455	87.45	0.0	87.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Clyde 446	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Clyde 446	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Clyde 446	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Leonardville 293	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Leonardville 293	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Leonardville 293	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Olsburg 468	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Olsburg 468	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Olsburg 468	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Riley 485	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Riley 485	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Riley 485	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED

**(710) Broadband Price Offerings**  
**Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
<035>	Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtinc.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	KS	Milford 463	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Milford 463	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Milford 463	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Wakefield 461	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Wakefield 461	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Wakefield 461	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Longford 388	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Longford 388	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Longford 388	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Aurora 464	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Aurora 464	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Aurora 464	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Glasco 568	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Glasco 568	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Glasco 568	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Delphos 523	46.45	0.0	46.45	15.0	1.0	999999.0	Other, NEVER REACHED
	KS	Delphos 523	61.45	0.0	61.45	20.0	1.0	999999.0	Other, NEVER REACHED
	KS	Delphos 523	86.45	0.0	86.45	25.0	1.0	999999.0	Other, NEVER REACHED
	KS	Barnard 792	39.45	0.0	39.45	5.0	1.0	999999.0	Other, NEVER REACHED
	KS	Barnard 792	54.45	0.0	54.45	7.0	1.0	999999.0	Other, NEVER REACHED
	KS	Barnard 792	69.45	0.0	69.45	10.0	1.0	999999.0	Other, NEVER REACHED

**(710) Broadband Price Offerings  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
<035>	Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtinc.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	KS	Beverly 436	39.45	0.0	39.45	5.0	1.0	999999.0	Other, NEVER REACHED
	KS	Beverly 436	54.45	0.0	54.45	7.0	1.0	999999.0	Other, NEVER REACHED
	KS	Beverly 436	69.45	0.0	69.45	10.0	1.0	999999.0	Other, NEVER REACHED
	KS	Tescott 283	39.45	0.0	39.45	5.0	1.0	999999.0	Other, NEVER REACHED
	KS	Tescott 283	54.45	0.0	54.45	7.0	1.0	999999.0	Other, NEVER REACHED
	KS	Tescott 283	69.45	0.0	69.45	10.0	1.0	999999.0	Other, NEVER REACHED
	KS	Bennington 488	39.45	0.0	39.45	5.0	1.0	999999.0	Other, NEVER REACHED
	KS	Bennington 488	54.45	0.0	54.45	7.0	1.0	999999.0	Other, NEVER REACHED
	KS	Bennington 488	69.45	0.0	69.45	10.0	1.0	999999.0	Other, NEVER REACHED
	KS	Miltonvale 427	39.45	0.0	39.45	5.0	1.0	999999.0	Other, NEVER REACHED
	KS	Miltonvale 427	54.45	0.0	54.45	7.0	1.0	999999.0	Other, NEVER REACHED
	KS	Miltonvale 427	69.45	0.0	69.45	10.0	1.0	999999.0	Other, NEVER REACHED
	KS	Greenleaf 747	39.45	0.0	39.45	5.0	1.0	999999.0	Other, NEVER REACHED
	KS	Greenleaf 747	54.45	0.0	54.45	7.0	1.0	999999.0	Other, NEVER REACHED
	KS	Greenleaf 747	69.45	0.0	69.45	10.0	1.0	999999.0	Other, NEVER REACHED
	KS	Morganville 926	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
	KS	Morganville 926	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
	KS	Green 944	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
	KS	Green 944	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
	KS	Clifton 455	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
	KS	Clifton 455	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<015>	Study Area Name	TWIN VALLEY TEL INC
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<030>	Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
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<035>	Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
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						Total Rates	Broadband Service	Broadband Service	Usage Allowance	Usage Allowance
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State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
KS	Clyde 446	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Clyde 446	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Leonardville 293	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Leonardville 293	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Olsburg 468	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Olsburg 468	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Riley 485	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Riley 485	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Milford 463	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Milford 463	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Wakefield 461	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Wakefield 461	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Longford 388	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Longford 388	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Aurora 464	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Aurora 464	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Glasco 568	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Glasco 568	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED
KS	Delphos 523	59.95	0.0	59.95	100.0	100.0	999999.0	Other, NEVER REACHED
KS	Delphos 523	99.95	0.0	99.95	1000.0	1000.0	999999.0	Other, NEVER REACHED

<b>(800) Operating Companies</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411840
<015>	Study Area Name	TWIN VALLEY TEL INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	TRACI THOMPSON
<035>	Contact Telephone Number - Number of person identified in data line <030>	7854272211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	traci.thompson@tvtninc.net
<810>	Reporting Carrier	TWIN VALLEY TELEPHONE COMPANY, INC.
<811>	Holding Company	Twin Valley Management, Inc.
<812>	Operating Company	TWIN VALLEY TELEPHONE COMPANY, INC.

[illegible]



**TWIN VALLEY TELEPHONE COMPANY, INC.**

**QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS**

**(USAC DOCUMENT - 411840KS510.PDF)**

**TWIN VALLEY TELEPHONE, INC.**  
**QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES**

**1. Available Customer Service Representatives to Answer Phones**

Twin Valley Telephone, Inc. utilizes ACD (Automated Call Distribution) to facilitate Customer Service representatives being accessible for incoming calls. The ACD architecture allows for multiple representatives to be available for incoming call volume.

**2. Provide After Hours Emergency Customer Service**

Call logs are reviewed daily by personnel. Customer service representatives have been given a list of questions by Twin Valley Telephone, Inc. to ask to assist them in resolving any issues. Unresolved issues are reviewed the following work day. Issues requiring immediate attention are sent to the Twin Valley Telephone, Inc.'s service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After-hours customer service is also available.

**3. Provide a 24/7 Hour Internet Help Desk Service**

Twin Valley Telephone, Inc. utilizes a third party 24/7 help desk. Call logs are reviewed by personnel with Managers available to review and address any issues.

**4. Online Bill Payments**

Payments made online are posted to the customer accounts and are viewable on the online customer account summaries within 48 hours. Any encountered problems are reported to the Office Supervisor, and resolved as quickly as possible.

## **5. Customer Satisfaction Surveys to All Current Subscribers**

A survey with questions regarding the areas of Phone, Office, Service Technicians, and Customer Support is made available to all customers to rate the company on a scale of 1 to 5; 1 being excellent. It is the goal of Twin Valley Telephone, Inc. to obtain a 1 or 2 (Excellent or Good) on 90% of returned surveys. Results are returned to the Manager who will call customers that gave the company a poor rating to determine what could be done differently to serve them better.

## **6. Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities**

Customers are given two months of missed payments before being cut off. Notification of the payment due date and the cut-off date are prominently displayed on bills as well as of the opportunity to make payment arrangements to avoid being cut-off. Customers in danger of losing service will receive a call from a customer service representative to remind them of the late payment. If a customer complains that notice was not given, they are directed to speak with the Office Manager who will work to resolve the matter and prevent it from occurring again. Account balance reports are printed monthly using the company's billing system.

## **7. Ensure That All New Service Installation Orders Are Fulfilled Promptly**

All customers are contacted within 48 hours regarding scheduling the new service installation. If outside plant is already in place, fill the order at the customers' earliest convenience; if outside plant is in not in place, fill the order as soon as the weather and pre-existing orders permit.

## **8. Minimize Customer Downtime for Services & Make Requested Changes Promptly**

Contact customers regarding all service requests the same day, with a goal of resolving all issues within 24 hours. Any unresolved issues will be resolved contingent on the technician/customer coordination of access to the premises.

## **9. Proactively Monitoring in Case of Major Service Outages**

Service technicians will be made aware of outages affecting customers within an hour. It is the goal of Twin Valley Telephone, Inc. to resolve major outages in four hours or less. In the event of a major outage, all resources are utilized, from within and without, to restore service as quickly as possible. Supervisors establish and track technician performance on a monthly and yearly basis.

## **CUSTOMER PRIVACY**

### **Company Confidential Information Policy**

Twin Valley Telephone, Inc. has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information.

The policy states: *"You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."*

### **Company CPNI Policy**

Twin Valley Telephone, Inc. has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that "failure to protect this information result in disciplinary action up to and including discharge for the responsible employee." As a part of this policy, Twin Valley Telephone, Inc. has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities and reporting breaches.

**TWIN VALLEY TELEPHONE COMPANY, INC.**

**EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER**

**(USAC DOCUMENT - 411840KS610.PDF)**

**TWIN VALLEY TELEPHONE, INC.**  
**EMERGENCY SITUATION FUNCTIONALITY**  
**AVAILABILITY OF BACK-UP POWER**

Twin Valley Telephone, Inc. has 19 central offices within its service area. Each of these locations is equipped with a back-up generator capable of providing power to the equipment within that office in the event of an external power source outage.

These generators are exercised weekly. After each power outage, generators are inspected and are also professionally serviced biannually to ensure functionality.

In addition, Twin Valley Telephone, Inc. has installed back-up batteries on the customer premise fiber access equipment. Spare batteries are kept at Twin Valley Telephone, Inc.'s main office for replacement of batteries at customer homes in the event of a prolonged power outage.

**TRAFFIC ROUTING**

Voice traffic between the central office switches is carried across a ringed fiber optic topology allowing continued service if one route is interrupted. Voice traffic between the central office switch and the upstream tandem is also provisioned across fiber optic transport.

## **MANAGING TRAFFIC SPIKES**

Twin Valley Telephone, Inc.'s careful capacity planning has put multiple constraints and triggers in place on its central office equipment, outside plant equipment and network backbone that will provide the company with the capability of handling traffic spikes during emergency situations.

- Usage rates are analyzed monthly by Twin Valley Telephone, Inc. using reports automatically generated by the switch to ensure that usage does not exceed 90% of total line capacity.
- Twin Valley Telephone, Inc. will monitor traffic on a monthly basis to ensure optimal efficiency.

**TWIN VALLEY TELEPHONE COMPANY, INC.**

**VOICE SERVICES RATE COMPARABILITY**

**(USAC DOCUMENT - 411840KS1010.PDF)**



## **Voice Services Rate Comparability**

### **Twin Valley Telephone, Inc.**

In compliance with the 54.313 Rules, Twin Valley Telephone, Inc. must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2017 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the 2016 rate floor for voice services is \$22.49 and the reasonable comparability benchmark for voice services is \$49.51<sup>1</sup>.

The rates shown on the Voice Pricing Form (0700) are below \$49.51. Consequently, Twin Valley Telephone, Inc. meets the above mentioned requirement.

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<sup>1</sup> WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2017 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCs SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS. WC Docket #10-90, DA 17-167 Public Notice - Released February 14th, 2017.

**TWIN VALLEY TELEPHONE COMPANY, INC.**

**BROADBAND RATE COMPARABILITY**

**(USAC DOCUMENT – 411840KS1030)**

## BROADBAND RATE COMPARABILITY TWIN VALLEY TELEPHONE, INC. - KANSAS

### BROADBAND BENCHMARK

According to the 2017 Broadband Reasonable Comparability Benchmark conducted by the FCC Wireline Competition Bureau (*and using the Reasonable Comparability Benchmark Calculator supplied by the FCC*), the reasonable comparability benchmark for Broadband rates are as follows<sup>1</sup>:

<b>Download Speed</b>	<b>Upload Speed</b>	<b>Usage Allowance</b>	<b>Benchmark</b>
6 Mbps	1 Mbps	Unlimited	\$71.27
10Mbps	1Mbps	Unlimited	\$77.98
15 Mbps	3 Mbps	Unlimited	\$83.82
25 Mbps	5 Mbps	Unlimited	\$90.77

### RATE REQUIREMENT

Per 47 C.F.R. § 54.313(a)(12), Twin Valley Telephone, Inc. pricing can be no more than the applicable benchmark as published annually by the Wireline Competition Bureau. The rates shown on Twin Valley Telephone, Inc.'s Broadband Price Offerings Form (0710) are all below the FCC's 2016 Broadband Pricing Benchmarks. Consequently, Twin Valley Telephone, Inc. meets the above mentioned requirement.

The Survey also noted that the required minimum usage allowance is 150GBs for rate-of-return carriers, such as Twin Valley Telephone, Inc. Twin Valley Telephone, Inc. does not currently implement a usage allowance maximum. All broadband customers have unlimited usage allowance.

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<sup>1</sup> <http://www.fcc.gov/encyclopedia/urban-rate-survey-data>

**TWIN VALLEY TELEPHONE COMPANY, INC.**

**LIFELINE PLAN**

**(USAC DOCUMENT - 411840KS1210.PDF)**



## 2017 Kansas Lifeline Program

Subscriber's Name: \_\_\_\_\_

Subscriber's Full Residential Address (No PO Boxes): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

☐ Permanent ☐ Temporary

Subscriber's Lifeline Billing Address: \_\_\_\_\_

☐ Check if same as Residential Address

Subscriber's Telephone Number: \_\_\_\_\_

Subscriber's Date of Birth: \_\_\_\_\_ Subscriber's last Four Digits of SS No.: \_\_\_\_\_  
 MM / DD / YYYY

You are eligible to qualify for Lifeline if you receive any of the following:

Medicaid, Supplemental Security Income (SSI), Section 8 Public Housing Assistance (FPHA), Supplemental Nutrition Assistance Program (SNAP), 135% of the federal poverty guidelines\*.

\*A consumer must provide THREE CONSECUTIVE MONTHS of statements as documentation of income, or provide a copy of their tax return for the previous year.

Current eligibility requirements are:

\*2016 Kansas Poverty Level Guidelines:

Number in Family	Maximum Annual Income
1	\$16,038
2	\$21,627
3	\$27,216
4	\$32,805
5	\$38,394
6	\$43,983
7	\$49,586
8	\$55,202
Each additional person	\$ 5,616

The Kansas Lifeline program is 135% of the 2016 Federal poverty level.

**Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.**

(See back of form)

# Kansas Lifeline Certification Form

When completed return form to:

**Twin Valley**  
**PO Box 515**  
**Clay Center, KS 67432**  
[tvttinc@twinvalley.net](mailto:tvttinc@twinvalley.net)  
**Phone: 800-515-3311**

This signed authorization is required in order to enroll you in the Lifeline program. This authorization is only for the purpose of verifying your participation in this program and will not be used for any other purpose.

1. Subscriber seeking to qualify for Lifeline under program-based criteria check all applicable below:

NOTE: A consumer must provide their award letter or program card as documentation they are enrolled in the program

<input type="checkbox"/> FPHA (Public Housing Assistance Section 8)	<input type="checkbox"/> Medicaid
<input type="checkbox"/> SSI (Supplemental Security Income)	<input type="checkbox"/> Veteran's Pension & Survivor Benefit
<input type="checkbox"/> SNAP (Supplemental Nutrition Assistance Program)	<input type="checkbox"/> %135 of federal poverty guidelines*

2. Subscriber seeking to qualify for Lifeline under the income based criterion, provide the number of individuals in residential household \_\_\_\_\_  
Number in household

NOTE: A consumer must provide THREE CONSECUTIVE MONTHS of statements as documentation of income, or provide a copy of their tax return for the previous year.

## CERTIFY PROSPECTIVE SUBSCRIBER'S ELIGIBILITY

Each prospective subscriber must certify, under penalty of perjury for receiving Lifeline support, by initialing each line:

- \_\_\_\_: The subscriber meets the income-based or program-based eligibility criteria.
- \_\_\_\_: The subscriber must notify the carrier within 30 days if for any reason the subscriber no longer satisfies the criteria receiving Lifeline support.
- \_\_\_\_: When the subscriber moves to a new address the subscriber must provide that new address to Twin Valley within 30 days.
- \_\_\_\_: When a subscriber provides a temporary residential address to Twin Valley, subscriber is required to verify their temporary address every 90 days.
- \_\_\_\_: Subscriber acknowledges that a household is eligible to receive only one Lifeline service and, to the best of his/her knowledge, the subscriber's household is not already receiving a Lifeline service. A household defined for purposes of the Lifeline program; as any individual or group of individuals who live together at the same address and share income and expenses.
- \_\_\_\_: The information contained in this subscriber's certification form is true and correct to the best of the subscriber's knowledge.
- \_\_\_\_: Subscriber acknowledges that providing false or fraudulent information on this certification form to receive Lifeline benefits is punishable by law.
- \_\_\_\_: Subscriber acknowledges that he/she may be required to re-certify their eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to their continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to Section 54.405(e)(4).
- \_\_\_\_: Lifeline is a non-transferrable benefit and the subscriber may not transfer his or her benefit to any other person.
- \_\_\_\_: A household is not permitted to receive Lifeline benefits from multiple providers.
- \_\_\_\_: Violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program.

Subscriber's Signature \_\_\_\_\_

Date \_\_\_\_\_

## TWIN VALLEY USE ONLY

Company's Signature \_\_\_\_\_

Date \_\_\_\_\_

Documentation provided to support eligibility: \_\_\_\_\_

**Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.**

**TWIN VALLEY TELEPHONE COMPANY, INC.**

**MILESTONE CERTIFICATION**

**(USAC DOCUMENT - 411840KS3010.PDF)**

Line 3010(b) - Milestone Certification

Twin Valley Telephone, Inc. certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 10 Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within reasonable amount of time.



**TWIN VALLEY TELEPHONE COMPANY, INC.**  
**CONSOLIDATED FINANCIAL STATEMENTS**  
**(USAC DOCUMENT - 411840KS3017.PDF)**

USDA-RUS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		BORROWER NAME	
		Twin Valley Telephone, Inc.  (Prepared with Audited Data)	
INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December, 2016	BORROWER DESIGNATION KS0574
CERTIFICATION			
We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.			
ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.			
DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII (Check one of the following)			
<input checked="" type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects			
<input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report			
Benjamin Foster		3/30/2017	
		DATE	

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			5. Accounts Payable		
2. Cash-RUS Construction Fund			6. Notes Payable		
3. Affiliates:			7. Advance Billings and Payments		
a. Telecom, Accounts Receivable			8. Customer Deposits		
b. Other Accounts Receivable			9. Current Mat. L/T Debt		
c. Notes Receivable			0. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			1. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			2. Income Taxes Accrued		
b. Other Accounts Receivable			3. Other Taxes Accrued		
c. Notes Receivable			4. Other Current Liabilities		
5. Interest and Dividends Receivable			5. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			6. Funded Debt-RUS Notes		
8. Prepayments			7. Funded Debt-RTB Notes		
9. Other Current Assets			8. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			9. Funded Debt-Other		
NONCURRENT ASSETS			0. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			1. Premium (Discount) on L/T Debt		
a. Rural Development			2. Reacquired Debt		
b. Nonrural Development			3. Obligations Under Capital Lease		
12. Other Investments			4. Adv. From Affiliated Companies		
a. Rural Development			5. Other Long-Term Debt		
b. Nonrural Development			6. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets			7. Other Long-Term Liabilities		
15. Deferred Charges			8. Other Deferred Credits		
16. Jurisdictional Differences			9. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			0. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service			1. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			2. Additional Paid-in-Capital		
20. Plant Under Construction			3. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			4. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			5. Other Capital		
23. Net Plant (18 thru 21 less 22)			6. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			7. Retained Earnings or Margins		
			8. Total Equity (51 thru 57)		
			9. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		
			5. 73% % of Total Assets		

<p align="center">USDA-RUS</p> <p align="center"><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p>	<p>BORROWER DESIGNATION</p> <p align="center">KS0574</p>
<p>INSTRUCTIONS- See RUS Bulletin 1744-2</p>	<p>PERIOD ENDING</p> <p align="center">December, 2016</p>

**PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS**

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. <b>Net Operating Revenues (1 thru 5 less 6)</b>		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. <b>Total Operating Expenses (8 thru 13)</b>		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. <b>Total Operating Taxes (17+18+19)</b>		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. <b>Total Fixed Charges (22+23+24-25)</b>		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. <b>Total Net Income or Margins (21+27+28+29+30-26)</b>		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. <b>Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]</b>		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. <b>Patronage Capital End-of-Year (40+41-42)</b>		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

<div>USDA-RUS</div> <div>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div> <div>INSTRUCTIONS - See RUS Bulletin 1744-2</div>	<div>BORROWER DESIGNATION</div> <div>KS0574</div> <div>PERIOD ENDED</div> <div>December, 2016</div>
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Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Barnard							
Bennington							
Beverly							
Greenleaf							
Miltonvale							
Tescott							
Aurora							
Leonardville							
Longford							
Morganville							
Riley							
Wakefield							
Clifton							
Clyde							
Delphos							
Glasco							
Green							
Milford							
Olsburg							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

<p style="text-align: center;">USDA-RUS</p> <p style="text-align: center;"><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p> <p style="text-align: center;">INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>BORROWER DESIGNATION</p> <p>KS0574</p> <p>PERIOD ENDED</p> <p>December, 2016</p>
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**Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION**

**4. BROADBAND SERVICE**

Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Adver ised Download Rate (Kbps) (d)	Adver ised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)

Barnard								
Bennington								
Beverly								
Greenleaf								
Miltonvale								
Tescott								
Aurora								
Leonardville								
Longford								
Morganville								
Riley								
Wakefield								
Clifton								
Clyde								
Delphos								
Glasco								
Green								
Milford								
Olsburg								
Total								

USDA-RUS		BORROWER DESIGNATION			
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		KS0574			
		PERIOD ENDING December, 2016			
INSTRUCTIONS- See RUS Bulletin 1744-2					
PART D. SYSTEM DATA					
PART E. TOLL DATA					
1. Study Area ID Code(s)		2. Types of Toll Settlements (Check one)			
a. 411840		Interstate:	<input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis		
b.					
c.		Intrastate:	<input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis		
d.					
e.					
f.					
g.					
h.					
i.					
j.					
PART F. FUNDS INVESTED IN PLANT DURING YEAR					
1. RUS, RTB, & FFB Loan Funds Expended					
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					
6. Salvaged Materials					
7. Contribution in Aid to Construction					
8. Gross Additions to Telecom. Plant (1 thru 7)					
PART G. INVESTMENTS IN AFFILIATED COMPANIES					
INVESTMENTS	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
(a)	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

<div>USDA-RUS</div> <div>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	BORROWER DESIGNATION
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PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
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EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		KS0574	
		PERIOD ENDED December, 2016	
INSTRUCTIONS – See help in the online application.			
PART I – STATEMENT OF CASH FLOWS			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)			
CASH FLOWS FROM OPERATING ACTIVITIES			
2. Net Income			
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3. Add: Depreciation			
4. Add: Amortization			
5. Other (Explain)			
Changes in Operating Assets and Liabilities			
6. Decrease/(Increase) in Accounts Receivable			
7. Decrease/(Increase) in Materials and Inventory			
8. Decrease/(Increase) in Prepayments and Deferred Charges			
9. Decrease/(Increase) in Other Current Assets			
10. Increase/(Decrease) in Accounts Payable			
11. Increase/(Decrease) in Advance Billings & Payments			
12. Increase/(Decrease) in Other Current Liabilities			
13. Net Cash Provided/(Used) by Operations			
CASH FLOWS FROM FINANCING ACTIVITIES			
14. Decrease/(Increase) in Notes Receivable			
15. Increase/(Decrease) in Notes Payable			
16. Increase/(Decrease) in Customer Deposits			
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)			
18. Increase/(Decrease) in Other Liabilities & Deferred Credits			
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital			
20. Less: Payment of Dividends			
21. Less: Patronage Capital Credits Retired			
22. Other (Explain)			
23. Net Cash Provided/(Used) by Financing Activities			
CASH FLOWS FROM INVESTING ACTIVITIES			
24. Net Capital Expenditures (Property, Plant & Equipment)			
25. Other Long-Term Investments			
26. Other Noncurrent Assets & Jurisdictional Differences			
27. Other (Explain)			
28. Net Cash Provided/(Used) by Investing Activities			
29. Net Increase/(Decrease) in Cash			
30. Ending Cash			

Revision Date 2010



<div>USDA-RUS</div> <div>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	<div>BORROWER DESIGNATION</div> <div>KS0574</div>
<div>INSTRUCTIONS - See RUS Bulletin 1744-2</div>	<div>PERIOD ENDED</div> <div>December, 2016</div>
<div>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	

USDA-RUS  OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION  KS0574
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	